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11 *Representing the United States of America*

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 vs.

17 TYLER MONSON,

18 Defendant.

19 Case No.: 3:25-cr-0006-MMD-CLB

20 **Joint Motion for Protective Order**

21 COMES NOW the United States of America, by and through SUE FAHAMI, Acting
22 United States Attorney, and MEGAN RACHOW, Assistant United States Attorney, and SEAN
23 MCCLELLAND, Assistant Federal Public Defender, counsel for defendant Tyler Monson, and
24 hereby stipulate and jointly request the Court to enter the attached proposed protective order
pursuant to Federal Rule of Criminal Procedure 16(d).

25 The discovery materials to be provided by the government contain files as well as video and
26 audio recordings which contain identifying information of an alleged child victim in this matter
27 (hereinafter the “protected information”). The protected information cannot be easily redacted.
28 Given the nature of the information, the parties agree that there is good cause to enter the

1 protective order to allow the defendant to fully evaluate this information while also protecting the
2 alleged child victim.

3 The “defense team” in this matter includes only the defendant, counsel of record for the
4 defendant, defense experts, and employees of defense counsel’s office who are working on this
5 case. The term “defense team” does not include any person or entity not specifically identified
6 herein, and thus does not include any of the defendant’s family members or any other associates of
7 the defendant.

8 The parties respectfully request that the Court order that the “defense team” shall not:

- 9 a. leave or provide copies of the protected information with the defendant Tyler
Monson, who is detained pending trial;
- 10 b. allow the defendant to view the protected information outside the presence of a
member of the defense team;
- 11 c. make copies of the protected information or allow copies of any kind to be made for
any other person;
- 12 d. allow any other person to view, hear or read the protected information;
- 13 e. divulge to any other person the contents of the protected information;
- 14 f. use the protected information for any purpose other than preparing to defend
against the charges in the indictment or any further superseding indictment arising
out of this case.

20 Defendant’s counsel of record agrees to advise all members of the defense team of their
21 obligations under the Protective Order and ensure their agreement to follow the Protective Order
22 prior to providing members of the defense team with access to any materials subject to the
23 Protective Order. In particular, defense counsel agrees to instruct the defendant Tyler Monson
24 / / /

1 that he shall not divulge the protected information to any other person and that doing so would
2 constitute a violation of a Court Order.

3 The government will identify any discovery produced under the Court's Protective Order
4 by labeling the CD or document "Confidential – Subject to Protective Order."

5 The parties agree that the Protective Order does not constitute a ruling on the question of
6 whether any particular material is properly discoverable or admissible and does not constitute any
7 ruling on any potential objection to the admissibility of any material.

8 Finally, upon conclusion of this action, the defendant's counsel agrees to return the
9 protected information to the United States or destroy and certify to government counsel the
10 destruction of the protected information, within a reasonable time, not to exceed thirty days after
11 the last appeal is final.

12 Accordingly, the parties jointly request the Court to enter the attached proposed protective
13 order.

14 IT IS SO STIPULATED.

15 Dated: March 6, 2025.

Respectfully Submitted,

16 SUE FAHAM
17 Acting United States Attorney

18 /s/ Megan Rachow
19 MEGAN RACHOW
20 Assistant United States Attorney

21 RENE L. VALLADARES
22 Federal Public Defender

23 /s/ Sean McClelland
24 SEAN MCCLELLAND
Attorney for Defendant
TYLER MONSON

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
vs.
TYLER MONSON,
Defendant.

Case No.: 3:25-cr-00006-MMD-CLB

Protective Order

The Court has read and considered the Joint Motion for Protective Order restricting the use and dissemination of files containing identifying information of the alleged child victim in this matter (hereinafter the “protected information”), filed by the government and the defendant Tyler Monson, and the Court hereby ORDERS as follows:

1. The Court finds that there is good cause to enter this Protective Order to allow the defendant to fully evaluate the protected information while also protecting the alleged child victim. Therefore, the United States may produce the protected information to the defendant's counsel subject to the conditions set forth in this Order.

2. For purposes of the Protective Order, the term “defense team” refers to the defendant, counsel of record for the defendant, defense experts, and employees of defense counsel’s office who work on this case. The term “defense team” does not include any other person or entity, and thus does not include the defendant’s family members or any other associates of the defendant.

3 The defense team shall not:

- 1 a. leave or provide copies of the protected information with the defendant Tyler
- 2 Monson, who is detained pending trial;
- 3 b. allow the defendant to view the protected information outside the presence of a
- 4 member of the defense team;
- 5 c. make copies of the protected information or allow copies of any kind to be made for
- 6 any other person;
- 7 d. allow any other person to view, hear or read the protected information;
- 8 e. divulge to any other person the contents of the protected information;
- 9 f. use the protected information for any purpose other than preparing to defend
- 10 against the charges in the indictment or any further superseding indictment arising
- 11 out of this case.

12 4. Defendant's counsel shall advise all members of the defense team of their
13 obligations under the Protective Order and ensure their agreement to follow the Protective Order
14 prior to providing members of the defense team with access to the protected information.

15 Defendant's counsel shall instruct the defendant Tyler Monson that he shall not divulge the
16 protected information to any other person and that doing so would constitute a violation of a
17 Court Order.

18 5. The government will identify any discovery produced under the Court's Protective
19 Order by labeling the CD or document "Confidential – Subject to Protective Order."

20 6. This Order does not constitute a ruling on the question of whether any particular
21 material is properly discoverable or admissible and does not constitute any ruling on any potential
22 objection to the admissibility of any material.

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1 7. Finally, the Court orders that upon conclusion of this action, defendant's attorney
2 shall return the protected information to the United States or destroy and certify to government
3 counsel the destruction of the protected information, within a reasonable time, not to exceed thirty
4 days after the last appeal is final.

5 IT IS SO ORDERED.

6
7 DATE

8 HONORABLE MIRANDA M. DU
9 UNITED STATES DISTRICT JUDGE

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